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A. LUIS LUCERO, JR., REGIONAL ATTORNEY KATHRYN OLSON, SUPERVISORY TRIAL ATTORNEY TERI HEALY, SENIOR TRIAL ATTORNEY EQUAL EMPLOYMENT OPPORTUNITY COMMISSION 909 FIRST AVENUE, SUITE 400 SEATTLE, WA 98104 TEL: (206) 220-6943

DOCKETED RECEIVED

SEP 2 6 2005

DORSEY & WHITNEY L.L.P. **ANCHORAGE**

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

EOUAL EMPLOYMENT OPPORTUNITY COMMISSION,

ATTORNEYS FOR PLAINTIFF

Plaintiff,

v.

UNITED FREIGHT AND TRANSPORT. INC.,

Defendant.

CIVIL ACTION NO. A01-0225CV (JKS)

EEOC'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT UNITED FREIGHT AND TRANSPORT, INC.

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, plaintiff Equal Employment Opportunity Commission ("EEOC" or "Commission") hereby requests that defendant, United Freight and Transport, Inc. ("United Freight" or "defendant"), respond to the following discovery requests within thirty days from the date of service. Plaintiff requests that the discovery requests followed by the word "answer" be answered separately, fully, and in writing under oath. The responses are to be tendered to the EEOC at its Seattle District Office located at 909 First Avenue, Suite 400, Seattle, Washington 98104-1061.

EEOC v. United Freight and Transport, Inc. EEOC'S 1ST Rogs and RFPs to Defendant

EQUAL EMPLOYMENT OPPORTUNITYCOMMISSION Seattle District Office

909 First Avenue, Suite 400 Seattle, Washington 98104-1061

> Telephone: (206) 220-6883 Facsimile: (206) 220-6911 TDD: (206) 220-6882

REQUEST FOR PRODUCTION NO. 21:

Produce all hand-written or typed notes, e-mails, memorandums, or other record(s) created by defendant, employee, or anyone else involved in the hiring process for the truck driver position which relate in any way to the hiring process of the subject position for which Shotsav Posciri applied.

Answer:

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REQUEST FOR PRODUCTION NO. 22:

Provide financial records of defendant from January 1, 2002 to date, including but not limited to all 10K reports, annual reports, other financial disclosures to State and/or Federal regulatory agencies.

Answer:

DATED this 28ed day of September 2005.

A. LUIS LUCERO, JR.

Regional Attorney

JAMES L. LEE

Deputy General Counsel

KATHRYN OLSON

Supervisory Trial Attorney

GWENDOLYN Y. REAMS Associate General Counsel

TERI HEALY

Senior Trial Attorney

EQUAL EMPLOYMENT OPPORTUNITY

COMMISSION

Seattle District Office

909 First Avenue, Suite 400

Seattle, Washington 98104

Telephone (206) 220-6916

Office of the General Counsel

1801 "L" Street NW

Washington, D.C. 20507

Attorneys for Plaintiff

EEOC v. United Freight and Transport, Inc. EEOC'S 1ST Rogs and RFPs to Defendant Page 10 of 10

EQUAL EMPLOYMENT OPPORTUNITYCOMMISSION Seattle District Office 909 First Avenue, Suite 400 Seattle, Washington 98104-1061 Telephone: (206) 220-6883

Facsimile: (206) 220-6911 TDD: (206) 220-6882

EXHIBIT A
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CERTIFICATE OF SERVICE

I hereby certify that I served **EEOC's FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT UNITED FREIGHT AND TRANSPORT, INC.** on:

William J. Evans DORSEY & WHITNEY LLP 1031 West 4th Avenue, Suite 600 Anchorage, Alaska 99501-5907 Attorneys for Defendant

by the following indicated method or methods:

by **mailing** a copy thereof in a sealed, first-class postage-paid envelope, addressed to the attorney(s) listed above, and deposited with the United States Postal Service at Seattle, Washington, on the date set forth below.

DATED this 23TH day of September, 2005.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Mary R. Hammock

Office Automation Assistant

Facilimito: (206) 220-6885 TODD: (206) 220-6885